

Page 1

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF ARIZONA

**EXHIBIT 5**

Adam McDorman, ) Case No. 2:22-CV-02180-CDB  
                  )  
Plaintiff,       )  
                  )  
vs.               )  
                  )  
Valley Christian Schools,     )  
An Arizona non-profit       )  
corporation,        )  
                  )  
Defendant.        )  
\_\_\_\_\_  
                  )

DEPOSITION OF ADAM McDORMAN

VIA VIRTUAL VIDEO CONFERENCE

March 1, 2024

Prepared by:

Magna Legal Services  
866-624-6221  
www.MagnaLS.com

Deborah J. Boyette, RPR  
Certified Reporter  
Certificate No. 50507

<p style="text-align: right;">Page 6</p> <p>1 A. Adam Steven McDorman.      2 Q. Mr. McDorman, have you ever been known by any      3 other names?      4 A. I have not.      5 Q. All right. This morning, have you taken any      6 medication or substance that would impair your ability      7 to testify truthfully?      8 A. No.      9 Q. Did you review any documents to prepare for      10 your testimony this morning?      11 A. Not this morning, I have not.      12 Q. Did you review any documents on any other day      13 in order to prepare for your deposition?      14 A. Yes.      15 Q. Do you recall what those documents were?      16 A. We looked at --      17 Q. Okay. Sorry. Mr. McDorman, I don't want to      18 know about anything that you discussed with your      19 attorney.      20 Just if there were any documents that you      21 recall looking at, just what those documents were.      22 If you don't remember, you don't recall, that's      23 absolutely fine. You can just say you don't know or you      24 don't recall.      25 A. I looked at the email that I received from</p>	<p style="text-align: right;">Page 7</p> <p>1 Kevin Allen.      2 I looked at portions of the employee handbook,      3 and also my employment contract for the 2021 school      4 year.      5 Q. Mr. McDorman, where do you currently live?      6 A. Current live in Chandler, Arizona.      7 Q. And where did you live back in 2021?      8 Were you residing in the same location?      9 A. Yes, I was.      10 Q. Prior to today, have you ever given a      11 deposition before?      12 A. No.      13 Q. Are you married?      14 A. Yes.      15 Q. What's your wife's name?      16 A. Amber.      17 Q. How long have you been married for?      18 A. Eight years.      19 Q. Do you have any children?      20 A. Yes.      21 Q. How many kids do you have?      22 A. I have one biological child and one foster      23 child.      24 Q. How old are your kids?      25 A. They're both five.</p>
<p style="text-align: right;">Page 8</p> <p>1 Q. Prior to the action that we're here for today,      2 have you ever been involved in a lawsuit either as a      3 plaintiff or defendant?      4 A. No.      5 Q. Could you provide me with your educational      6 background?      7 A. Sure. I have a bachelor's degree in computer      8 and information technology; and a bachelor's degree in      9 secondary education, with a focus in English and      10 language arts.      11 Q. Where did you obtain those degrees?      12 A. The technology degree I got at Purdue      13 University, and the education degree I got at Indiana      14 University.      15 Q. In addition to those degrees, are there any      16 other degrees or certificates that you hold?      17 A. Not at this time, no.      18 Q. Back in 2021, were there any other degrees or      19 certificates that you held that have since lapsed or      20 expired?      21 A. I believe I had an ACSI certification.      22 It's a Christian school teacher certification.      23 Q. Do you remember when you first obtained that      24 certification?      25 A. 2014.</p>	<p style="text-align: right;">Page 9</p> <p>1 Q. Approximately, how long did you hold that      2 certification for?      3 A. I don't know what the expiration was on my last      4 certification.      5 But from late 2014 until whenever the last one      6 expired, sometime after 2021.      7 Q. Okay. Do you remember how frequently you had      8 to renew that certification?      9 A. Every three years, I believe.      10 Q. Do you recall what the requirements were to      11 recertify with ACSI?      12 A. I don't recall the requirements.      13 Q. Aside from ACSI, any other certifications      14 related to teaching that you currently have or have held      15 in the past?      16 A. I had a State teaching license.      17 Q. Do you recall, approximately, when you held      18 that teaching license?      19 A. It would have been, probably, December 2021.      20 And before that, I had it for a while in 2013.      21 Q. Do you have that license now, or is that      22 expired?      23 A. I believe it's expired.      24 Q. Presently, are you employed?      25 A. Yes.</p>

Page 14

1 Q. Did you undergo any type of orientation; for  
 2 example, shadow any teachers when you were first hired?  
 3 A. We did have an orientation and, for the new  
 4 teachers, it was a little bit extended just to go over  
 5 normal HR things.  
 6 In the first year, we had, kind of, a mentor  
 7 kind of program.  
 8 Q. While you were employed at Valley Christian,  
 9 was there any sort of ongoing training that you went  
 10 through during the course of your employment?  
 11 A. We had occasional professional development  
 12 sessions where we would talk about teaching strategies  
 13 and things of that nature.  
 14 Q. Did you first obtain your ACSI Certification  
 15 when you started at Valley Christian?  
 16 A. I did.  
 17 Q. You didn't hold it before that?  
 18 A. No.  
 19 Q. I may have just asked you this, but did you  
 20 have to complete continuing education credits to  
 21 maintain that certification?  
 22 A. Yes, I did.  
 23 Q. Do you recall what type of continuing education  
 24 you had to complete?  
 25 A. I took a couple -- listened to a couple of,

Page 16

1 A. Yes.  
 2 He would come in and observe us. There would  
 3 be a formal announced observation, and he would also  
 4 drop in from time to time throughout the year.  
 5 And he had a rubric that he would score us on.  
 6 And then we would have a sit-down conversation  
 7 after that to go over the metrics.  
 8 Q. Speaking generally, during your time at Valley  
 9 Christian, what was the sort of tone of your  
 10 evaluations?  
 11 Did you feel they were generally positive?  
 12 Neutral?  
 13 A. They were very positive.  
 14 There was always a few things to work on,  
 15 continuing to hone your craft.  
 16 But they were always very positive in tone.  
 17 Q. Did you ever find that you had a negative  
 18 evaluation during your time at Valley Christian?  
 19 A. No, I never had a negative evaluation.  
 20 Q. At any point during your time at Valley  
 21 Christian, did you have any sort of disciplinary history  
 22 or disciplinary action taken against you?  
 23 A. Just one time.  
 24 Q. Do you recall, approximately, when that was?  
 25 A. March 2018, I think.

Page 15

1 like, programs that -- they were, basically, like a  
 2 sermon series that I would listen to for some continuing  
 3 education credits.  
 4 Q. Do you recall if the continuing education  
 5 credits had to be religious based, or if there was a  
 6 secular component?  
 7 A. I think a certain number of them could be  
 8 strictly like education focused, but I think a certain  
 9 part of it had to be Christian specific.  
 10 Q. During your time at Valley Christian, did you  
 11 undergo annual or regular evaluations in your position?  
 12 A. Yes. Yearly evaluations, yes.  
 13 Q. And who conducted those evaluations?  
 14 A. Paul Shanagher.  
 15 Q. Who is Paul?  
 16 A. Paul, when I began, was vice principal.  
 17 And then he took on a more, like, full-time,  
 18 like, dean of education, I think, might have been the  
 19 title.  
 20 He was just focused on the educational  
 21 components and training teachers.  
 22 Q. When you underwent those yearly evaluations,  
 23 what did they look like?  
 24 Was that a sit-down meeting?  
 25 Was that, sort of, a report card that you got?

Page 16

Page 17

1 Q. Just briefly, do you recall what the nature of  
 2 that incident or disciplinary action was?  
 3 A. Yeah. I retweeted a meme that someone had made  
 4 of me on Twitter.  
 5 And there was some foul language in this meme,  
 6 and they didn't like that.  
 7 Q. I assume that was on a personal account?  
 8 A. It was, yes.  
 9 Q. Do you know how Valley Christian became aware  
 10 of it?  
 11 A. I don't.  
 12 Q. Besides a conversation about that meme, was  
 13 there any other action taken?  
 14 A. I believe I had a short suspension.  
 15 Q. Besides that March 2018 incident, any other  
 16 disciplinary action or history while at Valley  
 17 Christian?  
 18 A. No.  
 19 Q. You were a salaried employee, correct?  
 20 A. Correct.  
 21 Q. Do you recall your salary at the time of your  
 22 hire?  
 23 A. I think it -- I don't remember the exact  
 24 number, but I think it was in the mid to upper \$30s,  
 25 around \$37,000.

<p style="text-align: right;">Page 26</p> <p>1       that would come back to administration.      2 BY MS. WALKUP:      3       Q. When your novels or texts were approved, who      4       would did that approving?      5       A. Well, Drew Streeter would approve the novels.      6       He didn't look at the shorter works that I used      7       throughout the year.      8       Q. While you were at Valley Christian, was there      9       any requirement for you to integrate theological lessons      10      into your lesson plans?      11      A. We were required to do biblical integration as      12      a part of our lesson planning.      13      So the instruction was to meaningfully      14      connect the learning in the classroom to biblical      15      principles.      16      Q. Who gave that direction to "meaningfully      17      connect" biblical lessons into your lesson plans?      18      A. That would have come from administration.      19      I believe, it was part of the contract in the      20      handbook.      21      It was spoken of frequently enough that you      22      could not know that you were supposed to do that.      23      Q. How often were you integrating biblical      24      teaching into your lesson plan?      25      A. The way I approached biblical integration in my</p>	<p style="text-align: right;">Page 27</p> <p>1       class was to use this biblical metanarrative as a lens      2       through which to view all of our readings and class      3       discussions.      4       So it was less -- for my class, it was less      5       specific verses. I didn't often use very specific      6       passages.      7       But did use the biblical metanarrative as a      8       foundational component of the entire course.      9       Q. So is it fair to say there was a biblical      10      aspect to your lessons every lesson? A couple times a      11      week?      12      How frequently?      13      A. It's hard to quantify because I laid my class      14      out as like a series of, kind of, weekly modules.      15      And the biblical metanarrative was a part of a      16      weekly writing, and was a part of our weekly Socratic      17      discussions.      18      Q. If I'm understanding, sort of, your      19      perspective, is it fair to say that the biblical      20      integrations were, sort of, inextricably linked to your      21      lesson plan?      22      MS. ROBINSON: Objection.      23      THE WITNESS: Yeah, yeah.      24      I think -- I mean, you could have found a way      25      to do it without if we would have used a different</p>
<p style="text-align: right;">Page 28</p> <p>1       critical lens.      2       But I used the biblical metanarrative as a      3       critical lens, so I would have had to do my class      4       differently.      5 BY MS. WALKUP:      6       Q. All right. So then as to your class in      7       particular, it wouldn't be possible to say that -- what      8       percentage of the class is spent on secular material and      9       a certain percentage was spent on religious or biblical      10      material?      11      A. No, I don't think you could quantify that.      12      Q. Now, was there a requirement for daily      13      devotions in your classes?      14      A. Yes, I believe we had -- I don't know if it was      15      daily or weekly.      16      I believe, we had daily. Yeah, four days a      17      week.      18      Q. All right. And I'm sorry. You had said you      19      were teaching AP literature.      20      Was there just one section of that class, or      21      did you teach multiple sections of that class?      22      A. So in my final year, I taught a few sections of      23      AP literature and still a few sections of American      24      literature.      25      Q. Do you recall, in your final year, how many</p>	<p style="text-align: right;">Page 29</p> <p>1       classes you were teaching in total?      2      A. Six.      3       I believe, yearbook would have been one of      4       those my last year.      5       Q. All right. Now, as to the daily devotions and,      6       you say, four days a week.      7       Would that be four days a week in each one of      8       those classes?      9      A. No.      10      So it would have been the second period class      11      each day, except for whatever day we had chapel on.      12      And we would go to -- the schedule would be      13      different when we would go to chapel.      14      Q. All right. What did the daily devotions      15      entail?      16      A. Those were left up to teacher discretion.      17      Q. Could you give me an example of what those      18      devotions looked like in your second period class?      19      A. Yeah. Usually, I would read a segment of the      20      devotional book that I had.      21      I think, most of the time, I used The      22      Mockingbird Devotional.      23      Q. You would read a section.      24      Would there be any discussion about it?      25      A. I would always open it up for questions or</p>

<p style="text-align: right;">Page 30</p> <p>1 thoughts after that.      2 Usually, the students were pretty shy about      3 engaging with that.      4 Q. About how long did these devotionals run, on      5 average?      6 A. We had 10 extra minutes built into the schedule      7 in the second period class.      8 Q. What was the length of class periods, in      9 general, except for the day with the extra 10 minutes?      10 A. It changed throughout the years. We tried a      11 couple of different schedules.      12 Usually, it was 40, 50 minutes.      13 Q. Aside from the devotionals, did you ever pray      14 with your students?      15 A. We had corporate prayer during chapel.      16 And there would be occasions where faculty      17 would come down and pray with students.      18 I didn't do a lot of one-on-one prayer with      19 students. Occasionally, but not super often.      20 Q. The few occasions that you did pray with      21 students, was that an in-class event, or was that      22 something that happened out of class on an individual      23 basis, in a group setting?      24 A. You know, I don't recall a lot of specific      25 incidences.</p>	<p style="text-align: right;">Page 31</p> <p>1 But they would have been outside of the normal      2 class time.      3 Q. And you mentioned the weekly chapel services.      4 That was a once-a-week occurrence?      5 A. Yes.      6 Q. Was that once a week for the entire duration of      7 your tenure at Valley Christian?      8 A. Yeah.      9 Q. Was it a specific day of the week?      10 A. Wednesday.      11 Q. Approximately, how long was that chapel      12 service?      13 A. I want to say it was an hour. Maybe a little      14 more.      15 Q. What did the chapel service entail?      16 A. We would, usually, sing a couple of songs      17 together.      18 And then someone would come up and do a      19 sermon.      20 And then we would always end by singing the      21 doxology before we were dismissed.      22 Q. Is that service something that all faculty and      23 student would attend?      24 A. Yes.      25 Q. Was there any requirement for you to</p>
<p style="text-align: right;">Page 32</p> <p>1 participate in that chapel service?      2 A. Everybody was supposed to be there.      3 But I didn't have to speak. I wasn't required      4 to speak.      5 Q. Did you ever lead the service or give a      6 sermon?      7 A. No.      8 Q. Were you ever required to lead the songs?      9 A. Never required to lead the songs.      10 But I did help play with the team -- the      11 worship team a few times.      12 Q. Did you play a musical instrument?      13 A. Yes.      14 Q. What did you play?      15 A. I played bass guitar.      16 Q. How often did you play in that band?      17 Was it every week?      18 A. No.      19 Maybe, once a year, on a special occasion.      20 Most of it was student led; at least, that part      21 of it was.      22 Q. Did you ever discuss the sermon or the service      23 with your students?      24 A. Yeah.      25 Q. In what sort of context would you discuss the</p>	<p style="text-align: right;">Page 33</p> <p>1 sermon or the service with them?      2 As a teacher, or as, sort of, a friendly ear?      3 A. That's a good question.      4 I mean, probably, a little bit of both.      5 I tried not to dictate how my students      6 interpreted those things.      7 But I liked to ask them questions just to get      8 their feedback and hear what they thought.      9 Q. So is it fair to say that discussion --      10 discussing the service or sermon with your students, you      11 would act more as a facilitator than a participant?      12 A. Yeah. Yeah, mostly.      13 Q. Are those sorts of discussions something that      14 would take place during class time or outside of class?      15 A. It was mostly outside of class time.      16 But, I mean, the class period directly after      17 chapel, it may come up, and we'd talk about it as we      18 were, kind of, getting into the work for the day.      19 Q. During your time at Valley Christian, was      20 there a requirement for you to participate in the emmaus      21 groups?      22 A. We did have those for a couple of years, yes,      23 early on in my time there.      24 Q. Do you remember, approximately, the time frame      25 that you had the emmaus group?</p>

Page 34

1 A. No, I don't recall specifically.  
 2 Q. What is an emmaus group?  
 3 A. My understanding was that it was, kind of, a  
 4 small group setting where teachers could act more in,  
 5 kind of, a mentor role with students.  
 6 And, maybe, like have some structure time  
 7 provided by the school to discuss biblical matters or  
 8 anything that might be on the students' minds.  
 9 Q. When did those groups take place?  
 10 A. It was its own space of time.  
 11 I think, they might have been once a week, but  
 12 I don't recall the specifics.  
 13 Q. During that group time, who would lead the  
 14 topics?  
 15 A. So, usually, we would be provided with some  
 16 materials from the Bible department that we could bring  
 17 up and the students could discuss.  
 18 Q. So is it fair to say your role in those groups  
 19 was to be a mentor or a facilitator of the discussions?  
 20 A. I would say so.  
 21 Q. And you mentioned that went on for a few years.  
 22 Was that the time that you participated in it,  
 23 or did they do away with those groups?  
 24 A. They did away with them.  
 25 I think, they were not very successful.

Page 35

1 Q. Do you recall, approximately, how many students  
 2 you would have in an emmaus group?  
 3 A. Maybe, around a dozen; 12 to, maybe, a few  
 4 more.  
 5 Q. You mentioned that the Bible department would  
 6 provide you with materials.  
 7 Were the discussions in those groups always  
 8 religious based?  
 9 A. To my knowledge, yes.  
 10 Q. Now, you mentioned earlier that during the  
 11 school year, that there would be some professional  
 12 development or in-service trainings.  
 13 How frequently during the school year would you  
 14 participate in those sorts of activities?  
 15 MS. ROBINSON: Objection, form.  
 16 THE WITNESS: We had orderly teacher in-service  
 17 time that we would usually do some kind of  
 18 professional development.  
 19 BY MS. WALKUP:  
 20 Q. Would it be more than once a year?  
 21 A. Yeah.  
 22 Usually, four times, once a quarter.  
 23 Q. Who's responsible for leading those in-service  
 24 trainings?  
 25 A. That differed from time to time.

Page 36

1 I believe, Paul Shanagher was the one who  
 2 oversaw all of that.  
 3 He might bring in someone from a teaching  
 4 college, a guest speaker.  
 5 Sometimes, a department would come up and  
 6 present something.  
 7 Sometimes, we'd do more collaborative teacher  
 8 work.  
 9 Q. All right. Speaking generally, would you say  
 10 that those in-service trainings were mostly secular  
 11 based, or had a religious component?  
 12 A. They would have been mostly nonspiritual  
 13 teacher focused things.  
 14 Q. Do you recall if you ever had any professional  
 15 development or in-service training on implementing the  
 16 Bible in your classes?  
 17 A. I believe, we did have an in-service about  
 18 biblical integration, at least, once or twice during my  
 19 time at Valley.  
 20 Q. During your time at Valley, was there a  
 21 requirement for you to attend faculty devotions?  
 22 A. We did have those as a part of our, kind of,  
 23 Monday morning huddle meeting before school.  
 24 Q. Were those the same types of things you had had  
 25 with your students during second period?

1 A. More or less.  
 2 I mean, they could vary from time to time.  
 3 When my time at Valley ended, we were often  
 4 having guest speakers from local churches come in and  
 5 speak.  
 6 That was happening in my last year or two. It  
 7 was happening every week.  
 8 Q. Who participated in those faculty devotions?  
 9 A. All the faculty were supposed to be there.  
 10 Q. Did administration participate in those?  
 11 A. Yes.  
 12 Q. And about how long were those faculty  
 13 devotions?  
 14 A. Maybe, 50 minutes.  
 15 Q. 50 or 15?  
 16 A. 50, five-zero.  
 17 Q. And did those take place before school?  
 18 A. During the last part of my time there, yes.  
 19 But when I started, we had a different  
 20 schedule configuration, and it happened after school on  
 21 Wednesdays.  
 22 Q. And you mentioned, towards the end of your time  
 23 there, they were bringing in guest speakers.  
 24 What sorts of things would the speakers  
 25 address?

10 (Pages 34 to 37)

<p style="text-align: right;">Page 38</p> <p>1        A. It could be a wide range of things from, you 2        know, kind of, general encouragement to, maybe, a more 3        specific message, you know, basic, sermon material. 4        The same sort of thing you might hear at a 5        Sunday church service, just shorter. They would speak 6        for, maybe, 10 or 15 minutes. 7        Q. Now, aside from your teaching duties, were 8        there other extracurricular activities that you 9        participated in at the school? 10      A. Not really, no. 11      Q. You've mentioned that you participated in 12     yearbook. 13      Was that a class? 14      A. Yes, that was a class period. 15      Q. Okay. And what did you teach during yearbook? 16      A. So that was more project focused, where I would 17     assign students pages or topics. 18      I would do a little bit of teaching about, kind 19     of, very basic journalism and some basic photography. 20      But I don't really have training in neither of 21     those two things. 22      Q. And was that the class that assembled the 23     yearbook at the end of the year? 24      A. Yes. 25      Q. Was that a class you volunteered for or a class</p>	<p style="text-align: right;">Page 39</p> <p>1        that was assigned to you? 2        A. Yeah, I volunteered for it. 3        Q. And aside from that class, did you coach any 4        sports or oversee any clubs during your time at Valley 5        Christian? 6        A. I didn't coach any sports, but I occasionally 7        would -- some students would gather semi-formally to 8        play board games in my classroom after school. 9        Now that I think about it, I did participate in 10      a culture club as well -- a culture group, toward the 11      end of my time at Valley. 12      Q. Was that a more, sort of, formal club at the 13      school? 14      A. That was formal, yeah. 15      Q. Would that take place during school hours or 16      after school? 17      A. Yes. 18      So they would occasionally -- like, the student 19     leaders of the group would meet after school, and they 20     would have, I think, maybe, a monthly or weekly, kind 21     of, gathering during lunchtime. 22      Q. To the best of your recollection, were there 23     any sort of guidelines and requirements implemented by 24     the school regarding clubs and what went on during those 25     meetings?</p>
<p style="text-align: right;">Page 40</p> <p>1        A. Not that I recall. 2        My role in the group wasn't -- I wasn't a lead 3        sponsor or anything. 4        I just, kind of, helped out whenever I could. 5        MS. WALKUP: Do you guys mind if we take a 6        quick bathroom break? 7        MS. ROBINSON: Yes, sounds good. 8        MS. WALKUP: All right. Say like five minutes? 9        It's 11:11 on my clock. Do you want to come 10      back at 11:20? 11      MS. ROBINSON: Sure, that works for us. 12      MS. WALKUP: Perfect, awesome. 13      (Brief recess.) 14      THE WITNESS: Can I clarify a couple of things, 15      just to make sure? 16      MS. WALKUP: For sure. 17      THE WITNESS: The emmaus groups, those groups 18      only happened, I think, for one school year, if I 19      recall. It wasn't a thing that we did for my 20      entire time at Valley. 21      And the faculty meetings, just to make sure I 22      say that right, the entire faculty meeting would be 23      50 minutes either before or after school, depending 24      on the schedule. And within that 50 minutes, we 25      would have a short 10-to-15-minute devotion.</p>	<p style="text-align: right;">Page 41</p> <p>1        BY MS. WALKUP: 2        Q. Great. Thank you for clarifying that. 3        For the emmaus group, was there any other small 4        group mentoring, or anything similar to the emmaus group 5        that took its place or preceded it? 6        A. Not that I recall. 7        I don't think we had any more, kind of, 8        structured events like that after that. 9        Q. Now, when did you first meet Victoria Brandon? 10      A. I think it would have been during her sophomore 11      year of high school. 12      Q. Do you recall what school year that was? 13      Was that the 2021-22 school year? 14      A. No. She was a senior that year. 15      So it would have been the 2019-2020 school 16      year. 17      Q. Was Victoria in your class? 18      A. Not at the time. 19      Q. Did you ever have Victoria in your class? 20      A. In her senior year. 21      I think, she might have been in my class her 22      junior year as well. 23      Q. Do you recall what classes that you had her 24      for? 25      A. If she was in her junior year, it would have</p>

<p style="text-align: right;">Page 62</p> <p>1 read it?</p> <p>2 A. I recognize most of it -- parts of it.</p> <p>3 Q. What do you recognize those parts to be?</p> <p>4 A. The part where it talks about marriage between</p> <p>5 a man and a woman.</p> <p>6 I remember having seen this language before.</p> <p>7 Q. Do you recognize this paragraph to be part of</p> <p>8 Valley Christian's mission statement?</p> <p>9 A. Yeah, it currently is.</p> <p>10 Q. Do you believe that this mission statement</p> <p>11 has -- was changed at any point during your tenure?</p> <p>12 A. I don't recall.</p> <p>13 I think -- I believe that some specificity</p> <p>14 around this issue has -- they've been more specific than</p> <p>15 they were when I started.</p> <p>16 Q. Is it your belief that the views that were</p> <p>17 espoused by Josh LeSage in your November 8th meeting</p> <p>18 aligned with this paragraph that you've just reviewed?</p> <p>19 A. Yes.</p> <p>20 Q. Would you say that this aligns with the views</p> <p>21 that you've expressed?</p> <p>22 A. No, it doesn't align with the views that I</p> <p>23 expressed.</p> <p>24 MS. WALKUP: Debbie, I'm going to mark this as</p> <p>25 Exhibit 1.</p>	<p style="text-align: right;">Page 63</p> <p>1 (Exhibit No. 1 was marked.)</p> <p>2 BY MS. WALKUP:</p> <p>3 Q. Now I'm going to bring your attention to</p> <p>4 another document. This is a 90-page document.</p> <p>5 I can scroll through if you -- actually, I can</p> <p>6 give you control if you want to scroll through and take</p> <p>7 a look and then let me know if you recognize that</p> <p>8 document.</p> <p>9 You should have control of the screen now if</p> <p>10 you want to scroll.</p> <p>11 A. I recognize this document.</p> <p>12 Q. What do you recognize the document to be?</p> <p>13 A. That is the employee handbook.</p> <p>14 Q. All right. Now, this is Page 12 of the</p> <p>15 document.</p> <p>16 It outlines some personal or spiritual</p> <p>17 qualifications for employees at Valley Christian.</p> <p>18 Do you see where it says that?</p> <p>19 A. Yes, I do.</p> <p>20 Q. And now I'm going to direct you down to No. 3</p> <p>21 and let you go ahead and read that to yourself, and let</p> <p>22 me know when you're all set.</p> <p>23 A. Yes.</p> <p>24 Q. And, now, do you believe that during your time</p> <p>25 at Valley Christian that you did accept Valley</p>
<p style="text-align: right;">Page 64</p> <p>1 Christian's statement of its faith?</p> <p>2 MS. ROBINSON: Objection, form.</p> <p>3 THE WITNESS: I did agree to abide by their</p> <p>4 statement of faith.</p> <p>5 MS. WALKUP: Debbie, I'm going to mark this as</p> <p>6 Exhibit 2, just Page 12, not the entire 90-page</p> <p>7 document.</p> <p>8 (Exhibit No. 2 was marked.)</p> <p>9 MS. WALKUP: For the record, I am going to mark</p> <p>10 the entirety of Exhibit 1, all six pages, as an</p> <p>11 exhibit.</p> <p>12 BY MS. WALKUP:</p> <p>13 Q. Mr. McDorman, I'm almost to the end. So thank</p> <p>14 you for bearing with me throughout the two hours that</p> <p>15 I've been torturing you.</p> <p>16 After you left Valley Christian, about a week</p> <p>17 or so after your termination, you never went back after</p> <p>18 that, correct?</p> <p>19 A. Correct.</p> <p>20 Q. During that week or so after you were</p> <p>21 terminated, or the first few weeks after your</p> <p>22 termination, sort of, emotionally, how were you doing</p> <p>23 during that time?</p> <p>24 A. I was devastated.</p> <p>25 My job meant a lot to me. Caring for my</p>	<p style="text-align: right;">Page 65</p> <p>1 students meant a lot to me.</p> <p>2 Being able to provide for my family meant a lot</p> <p>3 to me.</p> <p>4 And that disappeared so quickly, and sent shock</p> <p>5 waves through my entire life.</p> <p>6 I was not doing well for that week and after</p> <p>7 for a long time.</p> <p>8 Q. When you say that you weren't doing well, could</p> <p>9 you give examples or describe to me more what it was</p> <p>10 that you were experiencing?</p> <p>11 A. I barely slept. Ate very little. Less</p> <p>12 interested in doing any of the stuff that I normally</p> <p>13 liked.</p> <p>14 I just spent a lot of time thinking about what</p> <p>15 had happened.</p> <p>16 Really, the only thing that helped me get</p> <p>17 through that was the support of my wife and students who</p> <p>18 reached out.</p> <p>19 Q. Do you remember, approximately, how many</p> <p>20 students reached out to you?</p> <p>21 A. I think I was just in too anxious of a state to</p> <p>22 keep track of that.</p> <p>23 I was under extreme anxiety.</p> <p>24 It was numerous.</p> <p>25 Like I said earlier, I made it a point not to</p>